

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

I, Darla Agard, declare:

1. I am Vice President of Product Development at Thomson Reuters.
2. I reviewed the business records of Thomson Reuters to determine when the following products were first launched and made available to the public. Those dates are as follows:
  3. Graphical Bills was available to the public in March 2009.
  4. Graphical Statutes on Westlaw was available to the public on April 22, 2006.
  5. PastStat Locator on Westlaw was available to the public on August 26, 2004.
  6. PastStat Locator was available for sales as a “Module” in February 2007.
  7. RegulationsPlus on Westlaw was available to the public on February 10, 2006.

8. Regulations Suite on Westlaw was available to the public on October 14, 2006.
9. RegulationsPlus Corporate was available to the public in February 2006.
10. Exhibit E to TimeBase's Second Amended Complaint does not refer to any product named "RegulationsPlus Taxation." Moreover, following investigation, I have been unable to locate any Westlaw product entitled "RegulationsPlus Taxation."
11. RegulationsPlus was available for sale as a "Module" in February 2007.
12. Westlaw GC-Regulations Suite and RegulationsPlus (Module) was available to the public on February 13, 2007.
13. Securities Corporate Finance with RegulationsPlus and Legislative History on Westlaw (Westlaw PRO) (Banded) was available to the public on February 10, 2006.
14. Securities Litigation with RegulationsPlus and Legislative History on Westlaw (Westlaw PRO) (Banded) was available to the public on February 10, 2006.
15. Securities Practitioner Premier Plus Library on Westlaw (Westlaw PRO) (Banded) was available to the public on August 1, 2006.
16. StatutesPlus on Westlaw is not a saleable product. It was a series of enhancements to the Westlaw user interface, which were launched in February 2004.
17. The following five products are bundles of different products and services that can be purchased as a package: RegulationsPlus Corporate, Westlaw GC-Regulations Suite and RegulationsPlus (Module), Securities Corporate Finance with RegulationsPlus and Legislative History on Westlaw (Westlaw PRO) (Banded); Securities Litigation with RegulationsPlus and Legislative History on Westlaw (Westlaw

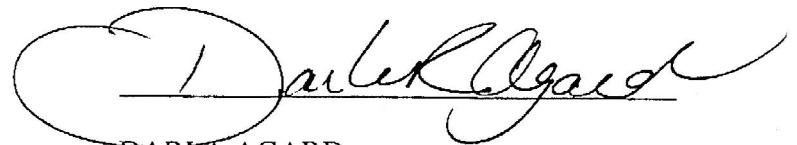
PRO) (Banded); and Securities Practitioner Premier Plus Library on Westlaw (Westlaw PRO) (Banded). Each of these bundles contains either PastStat Locator, Graphical Statutes, or RegulationsPlus as a component.

18. For example, "RegulationsPlus Corporate" is a bundle of services specifically geared towards practitioners of corporate law. It includes regulations focusing on corporate issues, as well as the versioning feature included in "RegulationsPlus."

19. The products referred to as "PastStat Locator Module" or "PastStat Locator (Module)" are the same product as "PastStat Locator." The term "Module" is a descriptive term that merely refers to the way in which this product is sold to certain customers under our PRO subscriptions.

20. The products referred to as "RegulationsPlus Module" or "RegulationsPlus (Module)" are the same product as "RegulationsPlus." The term "Module" is a descriptive term that merely refers to the way in which this product is sold to certain customers under our PRO subscriptions.

Date: November 18, 2009

  
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DARLA AGARD